

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

BRIAN LECLAIR, *individually and on
behalf of all others similarly situated,*

Plaintiff,

v.

AHOLD DELHAIZE USA SERVICES, LLC,

Defendant.

Case No.: 1:25-cv-00578

**NOTICE OF FILING OF BRIAN LECLAIR'S MOTION TO INTERVENE AND
ESTABLISH SCHEDULE FOR MOTIONS TO APPOINT INTERIM CLASS COUNSEL**

Proposed Intervenor Brian LeClair (“Intervenor”), by and through his undersigned counsel, hereby notifies this Court, that pursuant to Federal Rule of Civil Procedure 24, he has filed a motion to intervene in the case captioned *Henderson v. Ahold Delhaize USA Services, LLC, et al.*, Case No. 1:25-cv-00531 (M.D.N.C.) (the “*Henderson Action*”). If granted permission to intervene, Intervenor will ask the *Henderson* Court to set a schedule by which all interested counsel may submit an application for appointment as Interim Class Counsel pursuant to Fed. R. Civ. P. 23(g).

Dated: July 14, 2025.

Respectfully submitted,

/s/ Ryan A. Valente

Ryan A. Valente (N.C. Bar No. 40140)

POULIN | WILLEY | ANASTOPOULO, LLC

32 Ann Street

Charleston, SC 29403
Telephone: (803) 222-2222
Fax: (843) 494-5536
Email: teamvalente@poulinwilley.com
cmad@poulinwilley.com

-AND-

Gary F. Lynch*
gary@lcllp.com
Patrick D. Donathen*
patrick@lcllp.com
LYNCH CARPENTER, LLP
1133 Penn Ave., 5th Floor
Pittsburgh, PA 15222
Telephone: (412) 322-9243
Facsimile: (412) 231-0246

Attorneys for Plaintiff and the Proposed Class

**Pro hac vice* application forthcoming